



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 27 1998

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

**MEMORANDUM**

**SUBJECT:** National Remedy Review Board Recommendations for the Wellsbach/General Gas Mantle Superfund Site

**FROM:** Bruce K. Means, Chair   
National Remedy Review Board

**TO:** Richard L. Caspe, Director  
Emergency and Remedial Response Division  
EPA Region 2

**Purpose**

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Wellsbach/General Gas Mantle Superfund Site in Camden County, NJ. This memorandum documents the NRRB's advisory recommendations.

**Context for NRRB Review**

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions. The board will review all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. The review focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate regional decision maker before the region issues the proposed response action for public comment. The region will then include these recommendations in the Administrative Record for the site. While the region is expected to give the board's recommendations substantial weight, other important

**-- Pre-decisional; Not for distribution --**

factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

### **NRRB Advisory Recommendations**

The NRRB reviewed the informational package for the site and discussed related issues with EPA site managers Rick Robinson and Angela Carpenter on September 22-23, 1998. Based on this review and discussion, the board offers the following comments.

- The NCP sets forth program expectations to treat principal threats wherever practicable (40 CFR 300.430(a)(1)(iii)). Another expectation is to contain low level threats, because treatment for these wastes may not be cost effective or practicable. The NCP also states that, for many sites, EPA will use a combination of treatment and containment. These expectations are discussed further in "A Guide to Principal Threat and Low Level Threat Wastes" (OSWER Directive 9380.3-06FS, November 1991). The board recommends that the region include in the decision documents for this site the extent to which it considered treating any principal wastes at the site and its rationale for managing principal threat source materials in the context of the NCP.
- In the information presented to the board, the region includes among its remedial action objectives (RAOs) the minimization of human exposure "... to external gamma radiation that would result in total effective dose equivalents greater than 15 millirems per year ...". The board recommends that the region clarify the derivation of its RAOs in the context of the NCP's nine criteria for remedy selection.

The NRRB appreciates the region's efforts to work closely with the state and community to identify the current proposed remedy. The board members also express their appreciation to the region for its participation in the review process. We encourage Region 2 management and staff to work with their regional NRRB representative and the Region 2/6 Accelerated Response Center at headquarters to discuss any appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig  
T. Fields  
B. Breen  
J. Woolford  
C. Hooks  
R. Hall  
OERR Regional Center Directors

**-- Pre-decisional; Not for distribution --**